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April 22, 2025

VIA ECF

Honorable District Judge Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Drammeh, Musu K. v. Marshalls of MA, Inc., The TJX
Companies, Inc., The Marmaxx Group, Inc. and Marmaxx
Operating Corporation
Civil Action No.: 24-CV-06357-MMG
Our File No.: 598-9730

Dear Honorable Judge Garnett:

This office represents Defendants, Marshalls of MA, Inc., and The TJX Companies, Inc., i/s/h/a Marshalls of Ma, Inc., The TJX Companies, Inc., The Marmaxx Group, Inc., and Marmaxx Operating Corporation (collectively, "Defendants"), in the above-referenced matter. Please allow this letter to serve as a joint request for an order temporarily staying all remaining discovery deadlines while the parties engage in alternative dispute resolution.

The parties have agreed to private mediation with Joseph L. Ehrlich, Esq., of National Arbitration and Mediation. The mediation is scheduled for June 5, 2025. This represents the earliest date that all sides, and the mediator, are available for mediation.

Both sides are cautiously optimistic that a resolution can be reached, thereby avoiding the need for further discovery and its associated costs. Accordingly, the parties respectfully request that all remaining discovery deadlines be temporarily stayed

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pending the outcome of the upcoming mediation. In the event a settlement cannot be brokered with the assistance of Mr. Ehrlich, the parties should be in a position to complete the fact and expert discovery necessary to get this matter ready for trial and/or dispositive motion practice in relatively short order.

Counsel joins in the entirety of the application as outlined herein. Thank you for the opportunity to address the court in this matter.

Very truly yours,

/s/ Michael C. Lamendola
Michael C. Lamendola

MCL:
944390

cc: All counsel of record via ECF

GRANTED. All remaining discovery deadlines are hereby STAYED pending the outcome of the parties' upcoming mediation. The parties shall submit a joint status letter on the outcome of the mediation by **June 12, 2025**.

SO ORDERED. Dated April 24, 2025.


HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE